

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF  
PENNSYLVANIA

In Re:	)	BANKR. NO. 19-22551-GLT
	)	
JOSH LUKE FROBE,	)	CHAPTER 13
	)	
Debtor.	)	
_____	)	
	)	
JOSH LUKE FROBE,	)	
	)	
Movant/Debtor,	)	
	)	
vs.	)	
	)	
MIDLAND FUNDING, LLC,	)	
	)	
Creditor/Respondent.	)	

**CERTIFICATION OF NO OBJECTION REGARDING MOTION OF DEBTOR TO  
AVOID JUDGMENT LIEN UNDER 11 USCA § 522(f)(1)(A) PURSUANT TO  
BANKRUPTCY PROCEDURE RULE 9014**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on January 8, 2020, Doc. No. 43, has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the Hearing Notice filed on January 8, 2020, Doc. No. 44, Responses to the Motion were to be filed and served no later than January 27, 2020.

It is hereby respectfully requested that the Proposed Order filed on January 8, 2020 Doc. No. 43-2, be entered by the Court.

Dated: January 28, 2020

/s/ Glenn R. Bartifay  
GLENN R. BARTIFAY, ESQUIRE  
Pa. Id. No. 68763  
Attorney for Movant/Debtor

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